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Attorneys for Defendants Leeward Holdings, LLC, Camarillo Holdings, LLC, Dartmoor Holdings, LLC, IC Holdings, LLC, Backpage.com, LLC, Website Technologies, LLC, Amstel River Holdings, LLC, Lupine Holdings, LLC, Kickapoo River Investments, LLC, CF Holdings GP, LLC, CF Acquisitions, LLC, Carl Ferrer, Michael Lacey and James Larkin

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

**SCOTT KOCHER, in his capacity as  
Personal Representative of The Estate of  
ASHLEY BENSON,**

**PLAINTIFF,**

**v.**

**HILTON WORLDWIDE HOLDINGS,  
INC.; HILTON DOMESTIC OPERATING  
COMPANY, INC.; HILTON FRANCHISE  
HOLDING, LLC; WMK PORTLAND,  
LCC; GRACE LIAL; MEDALIST  
HOLDINGS, LLC; LEEWARD  
HOLDINGS, LLC; CAMARILLO  
HOLDINGS, LLC; DARTMOOR  
HOLDINGS, LLC; IC HOLDINGS, LLC;  
BACKPAGE.COM, LCC; UGC TECH  
GROUP C.V.; WEBSITE  
TECHNOLOGIES, LLC; ATLANTISCHE  
BEDRIJVEN C.V.; AMSTEL RIVER**

Case No. 3:18-cv-00449-SB

**UNOPPOSED MOTION TO EXTEND  
TIME FOR DEFENDANTS TO  
RESPOND TO COMPLAINT  
PURSUANT TO FED. R. CIV. P. 6(b)**

**HOLDINGS, LLC; LUPINE HOLDINGS, LLC; KICKAPOO RIVER INVESTMENTS, LLC; CF HOLDINGS GP, LLC; CF ACQUISITIONS, LLC; CARL FERRER; MICHAEL LACEY; JAMES LARKIN; AND JOHN DOES 1-5,**

**DEFENDANTS.**

### **CERTIFICATE OF COMPLIANCE WITH L.R 7.1**

Counsel for defendants Leeward Holdings, LLC, Camarillo Holdings, LLC, Dartmoor Holdings, LLC, IC Holdings, LLC, Backpage.com, LLC, Website Technologies, LLC, Amstel River Holdings, LLC, Lupine Holdings, LLC, Kickapoo River Investments, LLC, CF Holdings GP, LLC, CF Acquisitions, LLC, Carl Ferrer, Michael Lacey and James Larkin (“Backpage defendants”) certify that he has conferred in good faith with counsel for plaintiff concerning the matter herein, and that plaintiff does not object to this request. Counsel for Backpage defendants further certifies he has conferred with counsel for defendants Hilton Worldwide Holdings, Inc. Hilton Domestic Operating Company, Inc., Hilton Franchise Holding, LLC, WMK Portland, LLC, and Grace Lial, who also do not oppose this request.

### **MOTION**

Pursuant to Fed. R. Civ. P. 6(b), Backpage defendants move the court for an order enlarging their time to respond to the complaint, whether by answer or motion, until 10 days after the Court’s ruling on plaintiff’s forthcoming motion to remand. No previous extension of time has been granted by this court.

### **POINTS AND AUTHORITIES**

Defendants Ferrer, Lacey, and Larkin removed this case on Wednesday, March 14, 2018. Under Fed. R. Civ. P. 81(c)(2)(C), defendants’ responses are presently due on March 21, 2018. Counsel for Backpage defendants has conferred with counsel for plaintiff, and counsel for plaintiff informs counsel for Backpage defendants that plaintiff intends to move the Court to remand this case to the Circuit Court for the State of Oregon, Multnomah County. Cunningham Dec. ¶ 2.

Given the forthcoming motion for remand, and the complicated issues presented in defendants Ferrer, Lacey, and Larkin's removal, Backpage defendants submit this case will proceed most efficiently, for the parties and the Court, if defendants respond to the complaint after the Court has determined whether the case will proceed in this Court or in Multnomah County.

This motion is made in good faith and for the reasons stated in the Declaration of Tim Cunningham filed herewith.

DATED this 21st day of March, 2018.

**DAVIS WRIGHT TREMAINE LLP**

By s/ Tim Cunningham

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Carl Ferrer, Michael Lacey and James Larkin